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December 30, 2021

Honorable Sarah L. Cave
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
Courtroom 18A
New York, NY 10007

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Plaintiff's requested extension (ECF No. 13) is GRANTED. Plaintiff shall file her motion for judgment on the pleadings by **March 1, 2022**. The Commissioner shall file its motion for judgment on the pleadings by **May 2, 2022**. Plaintiff shall file her reply, if any, by **May 23, 2022**.

The Clerk of Court is respectfully directed to close ECF No. 13.

SO ORDERED 1/3/2022


SARAH L. CAVE
United States Magistrate Judge

Re: Madeline Mercado v. Comm'r of SSA 1:21-cv-04736-ER

Dear Honorable Judge Cave:

Pursuant to the Revised Scheduling Order in the above referenced case, Plaintiff's motion for Judgment on the Pleadings is due on December 31, 2021. Plaintiff writes to respectfully request a second 60 day extension of time to file her motion. Plaintiff requests the Court's indulgence with this second request as we expected to complete our brief herein, but for unforeseen staffing issues which included a positive coronavirus diagnosis as well as 20 motions coming due in December, as the Defendant alleviates her backlog of administrative records.

The Defendant was emailed on December 29, 2021 for consent, and again earlier today but has not yet responded, presumably due to the holidays. Plaintiff is filing the motion notwithstanding because the current due date of December 31, 2021, is a holiday. Plaintiff will file an amended motion with Defendant's response upon the Court's advisement to do so.

Thank you in advance for the Court's consideration of this second request.

Respectfully Submitted,

/s/Eddy Pierre Pierre
Eddy Pierre Pierre, Esq.